

# United States District Court

for the  
Western District of New York

United States of America

v.

Case No. 22-MJ-75

CYNTHIA MCKNIGHT

*Defendant*

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date of April 19, 2022, in the County of Erie, in the Western District of New York, the defendant did interfere with flight crew members and attendants, in violation of Title 49, United States Code, Section 46504.

This Criminal Complaint is based on these facts:

☒ Continued on the attached sheet.



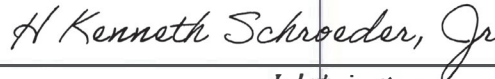
*Complainant's signature*

CHRISTOPHER DAILEY  
Special Agent  
Federal Bureau of Investigation

*Printed name and title*

Sworn to before me telephonically

Date: April 20, 2022



*Judge's signature*

City and State: Buffalo, New York

HONORABLE H. KENNETH SCHROEDER, JR.  
UNITED STATES MAGISTRATE JUDGE

*Printed name and title*

**AFFIDAVIT**

STATE OF NEW YORK       )  
COUNTY OF ERIE        )  
CITY OF BUFFALO        )       SS:

**I.     INTRODUCTION**

I, **Christopher A. Dailey**, Special Agent of the Federal Bureau of Investigation, United States Department of Justice, having been duly sworn, states as follows:

1.     I am a Special Agent of the Federal Bureau of Investigation (“FBI”) of the United States Department of Justice. As such, I am an “investigative or law enforcement officer of the United States” within the meaning of 18 U.S.C. § 2510(7), that is, an officer of the United States who is empowered by law to conduct investigations of and to make arrests for offenses enumerated in 18 U.S.C. § 2516.

2.     I have served as an FBI Special Agent since July of 2015. During that time, I have participated in investigations involving violent crime, drug trafficking and organized crime matters. In addition, I have had the opportunity to work with several other FBI agents and other law enforcement agents and officers of varying experience levels, who have also investigated organized crime and drug trafficking networks. I also serve as the FBI Buffalo Division Airport Liaison Agent. As such, I investigate violations of federal law that occur within the airport environment and aboard aircrafts. My investigative experience detailed herein, and the experiences of other law enforcement agents, who are participating in this investigation, serve as the basis for the opinions and conclusions set forth herein.

3. This affidavit is being submitted for a limited purpose, that is, a probable cause determination. Therefore, I have not presented all of the facts of this investigation to date. I have set forth only the information I believe to be necessary to establish probable cause. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from law enforcement officers and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this manner.

4. I make this affidavit in support a criminal complaint charging **CYNTHIA MCKNIGHT** with violating Title 49, United States Code, 46504 (Interference with Flight Crew Members and Attendants).

## **II. PROBABLE CAUSE**

5. On or about April 19<sup>th</sup>, 2022, American Airlines Flight 3933 was a flight departing Buffalo Niagara International Airport, Buffalo, New York enroute to Chicago O'Hare International Airport (ORD), Chicago, New York.

6. After the doors of the plane were closed, and while the plane was beginning to depart, a passenger later determined to be CYNTHIA MCKNIGHT, was asked by flight attendants to get off her phone so the plane could depart. MCKNIGHT became irate. MCKNIGHT was observed standing up, leaving her seat, and going to the front of the plane. MCKNIGHT argued with passengers and spit on one passenger.



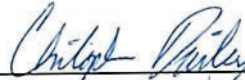
7. MCKNIGHT was observed taking out her phone and recording other passengers. MCKNIGHT then began walking to the front door of the airplane. MCKNIGHT pushed one of the flight attendants out of the way, opened the door, and slid down an emergency inflatable slide. MCKNIGHT then ran away from the plane and was taken into custody by the Niagara Frontier Transportation Authority (NFTA) Police and airport personnel on the tarmac. Additionally, MCKNIGHT resisted arrest and later caused damage to a wall located inside the NFTA police station.

8. American Airlines stated to law enforcement that the plane was declared inoperable due to the emergency slide being activated and had all the passengers disembark the plane and reschedule their flights. American Airlines reported an estimated damage of approximately \$50,000.

9. The NFTA police reported that all flight operations at the Buffalo Niagara International Airport were temporarily halted until the situation was under control.

10. During a post-*Miranda* interview with law enforcement, MCKNIGHT admitted to being under the influence of alcohol. MCKNIGHT stated she was upset that the flight was delayed, and she wanted to get off. MCKNIGHT stated she was involved in an argument with multiple passengers and spit on one of them because the passenger was recording her. MCKNIGHT stated she then realized she was going to be in trouble and decided to get off the plane.

11. **WHEREFORE**, based upon the foregoing, I respectfully submit that there is probable cause to believe that **MCKNIGHT** did knowingly, willfully, and unlawfully violate Title 49, United States Code , 46504.

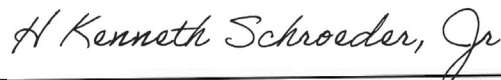


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CHRISTOPHER DAILEY  
Special Agent  
Federal Bureau of Investigation

Sworn to telephonically

This 20<sup>th</sup> day of April, 2022.



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HONORABLE H. KENNETH SCHROEDER  
United States Magistrate Judge